

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IME WATCHDOG, INC.,

Plaintiffs,

-against –

SAFA ABDULRAHIM GELARDI, VITO
GELARDI, and IME COMPANIONS, LLC,

Defendants.

Case No.: 1:22-cv-1032 (PKC) (JRC)

**STIPULATION AND ORDER OF
VOLUNTARY DISMISSAL WITHOUT
PREJUDICE AND WITHOUT COSTS OR
ATTORNEYS' FEES AS TO
DEFENDANTS' COUNTERCLAIMS
AGAINST PLAINTIFF AND THIRD-
PARTY CLAIMS AGAINST
DANIELLA LEVI**

SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against –

CARLOS ROA and DANIELLA LEVI,

Third-Party Defendants.

Defendants/Counterclaimants/Third-Party Plaintiffs Safa Gelardi (“Safa”), Vito Gelardi (“Vito”), and IME Companions, LLC (“Companions”) (Safa, Vito, and Companions collectively hereinafter the “Defendants”) and Plaintiff/Counterclaim Defendant IME Watchdog, Inc. (“Watchdog”), and Third-Party Defendant Daniella Levi (“Levi”), by and through their undersigned counsel, hereby stipulate to the following:

1. Companions’ and Safa’s counterclaims against Watchdog are hereby dismissed without prejudice and without costs or attorney fees to either party.
2. Companions’ and Safa’s third-party claims against Levi are hereby dismissed without prejudice and without costs or attorney fees to either party.

3. Companions' and Safa's Third-Party claims against Third-Party Defendant Carlos Roa ("Roa") will not be affected by this Stipulation.

4. The caption to this case is hereby amended as follows:

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
IME WATCHDOG, INC.,

Plaintiff,

Case No.: 1:22-cv-1032 (PKC) (JRC)

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
and IME COMPANIONS LLC,

Defendants.

-----X
SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.

-----X

Dated: New York, New York
June 16, 2022

Dated: Lake Success, New York
June 16, 2022

WARNER & SCHEUERMAN

MILMAN LABUDA LAW GROUP PLLC

/s/ Jonathan D. Warner, Esq.
Jonathan D. Warner, Esq.
6 West 18th Street, 10th Floor
New York, NY 10011-4602
(212) 924-7111 (telephone)
jdwarner@wslaw.nyc

/s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
emanuel@mllaborlaw.com

*Attorneys for Defendants
Third-Party Plaintiffs
Safa, Vito, & Companions*

*Attorneys for Plaintiff/Counterclaim
Defendant and Third-Party
Defendant Daniella Levi*

Dated: Greenvale, New York
June 16, 2022

Leo Shalit, P.C.

/s/ Leo Shalit, Esq.

Leo Shalit, Esq.
45 Glen Cove Road
Greenvale, NY 11548
(833) 742-5481 Ext. 2
leo@shalit-law.com

*Attorneys for Third-Party Defendant
Carlos Roa*

SO ORDERED:

Hon. Pamela K. Chen, U.S.D.J.

Dated: June _____, 2022